

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In Re:	§	
	§	
Allan L. Reagan,	§	Bankruptcy Case No. 20-11161-TMD
	§	Chapter 11
Debtor.	§	
	§	

**CREDITOR LONE STAR NATIONAL BANK’S JOINDER TO OBJECTIONS TO THE
DEBTOR’S FIRST AMENDED PLAN OF REORGANIZATION**

TO THE HONORABLE TONY DAVIS, UNITED STATES BANKRUPTCY JUDGE:

Creditor Lone Star National Bank (“Lone Star”) hereby submits this joinder (the “Joinder”) to various objections to the Debtor’s First Amended Plan of Reorganization and, in support hereof, states as follows:

JOINDER

1. Lone Star hereby adopts and joins the Subchapter V Trustee’s Limited Objection to the Debtor’s First Amended Plan [Docket No. 92].

2. Lone Star further adopts and joins the objections filed by creditor Village @ La Orilla LLC [Docket No. 93] and Comerica Bank [Docket No. 95].

WHEREFORE PREMISES CONSIDERED, Lone Star respectfully requests that the Court (a) sustain the objections in which Lone Star joined above, (b) deny confirmation of the Plan, or in the alternative, defer a hearing on this matter until the resolution of any claim objections brought by Debtor, and (c) grant Lone Star such other and further relief as is just, proper, and equitable.

Dated this 15th day of March 2021.

Respectfully submitted,

/s/ Stephen K. Lecholop II

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**ATTORNEY FOR LONE STAR NATIONAL
BANK**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on this 15th day of March 2021 upon all parties registered to receive electronic notice through the Court's CM/ECF system and on the parties listed below either electronically or by first class mail.

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Bruce John Zabarauskas on behalf of Creditor Wells Fargo as Trustee for the benefit of the
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